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Honorable Barbara Rothstein

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SHARON ADAMS,
No. 2:21-cv-00538 BJR
Plaintiff,

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF WASHINGTON AT SEATTLE

STIPULATED MOTION AND ORDER CONTINUING TRIAL AND REMAINING PRE-TRIAL DATES

INC., a foreign corporation, and CBRE GROUP, INC., a foreign corporation, ,

Defendants.

WALMART INC., a foreign corporation, ASSA ABLOY ENTRANCE SYSTEMS,

## I. STIPULATION

The parties in this matter stipulate and agree to move the Court for an Order continuing the trial date and remaining pre-trial deadlines. The parties agree there is a need for additional time for a number of reasons, including the following: (1) to obtain the medical records of the plaintiff, which have been ordered but believed to be subject to significant delay from the providers due to the COVID-19 pandemic; (2) to schedule plaintiff's medical review as requested by defendants; (3) to resolve pending discovery disputes; and (4) to allow time for experts to prepare reports based on a full record. The parties also anticipate that (5) additional

STIPULATED MOTION AND [PROPOSED] ORDER CONTINUING CERTAIN PRE-TRIAL DATES (No. 2:21-cv-00538 BJR) - 1

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STIPULATED MOTION AND [PROPOSED] ORDER CONTINUING CERTAIN PRE-

TRIAL DATES (No. 2:21-cv-00538 BJR) - 2

time for trial will be required because of the addition of two defendants since this matter commenced and, therefore, ask the Court to reserve eight days for trial.

This is the first continuance of the trial date. The parties propose a trial date of August 1, 2022, and the remaining pretrial dates as follows:

Case Event	Current Deadline	New Deadline
Reports from expert witness under FRCP 2(a)(2) due	January 18, 2022	April 5, 2022
Discovery completed by	February 16, 2022	May 4, 2022
All dispositive motion must be filed by	March 17, 2022	June 2, 2022
All Motions in limine must be filed by	April 11, 2022	June 27, 2022
Joint Pretrial statement	May 2, 2022	July 18, 2022
Pretrial conference	May 2, 2022	July 18, 2022
JURY TRIAL	MAY 16, 2022	AUGUST 1, 2022

# RESPECTFULLY SUBMITTED December 13, 2021.

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ORDER Pursuant to the foregoing stipulation of the parties, the Court directs the Clerk to enter a minute order reflecting the above amended pre-trial dates. IT IS SO ORDERED Dated this 13th day of December 2021. Barbara Jacobs Rothstein U.S. District Court Judge